

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13  
DARREL J. SMITH, JR. : CASE NO: 4:22-bk-11338-PMM  
and KARA R. SMITH, :  
Debtors :

**ENTRY OF APPEARANCE AND REQUEST FOR NOTICES**

To the Clerk of the Bankruptcy Court, the Debtor, All Trustees, All Creditors, and All Other Parties in Interest: **PLEASE TAKE NOTICE** that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears in the above-captioned Chapter 13 case on behalf of PA CENTRAL FEDERAL CREDIT UNION (the "Credit Union"), and demands that all notices given or required to be given in this case, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telefax, telegraph, telex, ECF noticing or otherwise, which affects the Debtors are to be served upon:

Bret P. Shaffer, Esquire  
Attorney I.D. #309180: PA  
Schiffman, Sheridan & Brown, P.C.  
2080 Linglestown Road, Suite 201  
Harrisburg, PA 17110

**PLEASE TAKE FURTHER NOTICE** that this entry of appearance is not intended as, nor is it a consent to, jurisdiction of the Bankruptcy Court over Credit Union, nor is it intended as a waiver of any right of Credit Union, specifically, but not limited to: (i) its right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) its right to a trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which Credit Union is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments Credit Union hereby expressly reserves.

SCHIFFMAN, SHERIDAN & BROWN, P.C.

By: /s/Bret P. Shaffer

Bret P. Shaffer, Esquire  
Attorney I.D. #309180: PA  
2080 Linglestown Road, Suite 201  
Harrisburg, PA 17110  
Attorney for PA Central Federal Credit Union

Date: 9/28/2022

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**CERTIFICATE OF SERVICE**

I, Bret P. Shaffer, hereby certify that I this day served a true and correct copy of the foregoing document upon the parties listed below by filing it with the Clerk of the Bankruptcy Court using the CM/ECF system:

Scott F. Waterman, Esquire  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading PA 19606

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street  
Suite 320  
Philadelphia PA 19107

Thomas W. Fleckenstein, Esquire  
1338 Malleable Road  
Columbia PA 17512

/s/Bret P. Shaffer

Bret P. Shaffer, Esquire  
Attorney I.D. #309180: PA  
SCHIFFMAN, SHERIDAN & BROWN, P.C.  
2080 Linglestown Road, Suite 201  
Harrisburg, PA 17110  
Attorney for PA Central Federal Credit Union

Date: 9/28/2022